

NJID 810511

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Attorneys for SETERUS, INC., AS AUTHORIZED SUBSERVICER FOR FEDERAL
NATIONAL MORTGAGE ASSOCIATION ("FANNIE MAE"), A CORPORATION
ORGANIZED AND EXISTING UNDER THE LAWS OF THE UNITED STATES OF AMERICA

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13

KENNETH E. WRIGHT A/K/A :
KENNETH WRIGHT D/B/A THE WOOD : CASE NO. 18-15336-JNP
DOCTOR

Debtor(s) :
**: NOTICE OF MOTION FOR
: RELIEF FROM AUTOMATIC
: STAY PURSUANT TO 11 USC
: SECTION 362(d)**

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ISABEL C. BALBOA
CHAPTER 13 STANDING TRUSTEE
CHERRY TREE CORPORATE CENTER
535 ROUTE 38 - SUITE 580
CHERRY HILL, NJ 08002

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U.S. TRUSTEE
US DEPT OF JUSTICE
OFFICE OF THE US TRUSTEE
ONE NEWARK CENTER STE 2100
NEWARK, NJ 07102

FAY DAVIS WRIGHT
424 WEST AVENUE
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PLEASE TAKE NOTICE that on 07/31/2018 @10:00AM or as soon as counsel
may be heard, the undersigned attorney for the secured creditor will move before the United
States Bankruptcy Court, FOURTH FLOOR, CAMDEN, New Jersey for an Order Vacating
the Automatic Stay with respect to property located at 424 WEST AVENUE, OCEAN
CITY, NJ 08226 and allowing SETERUS, INC., AS AUTHORIZED SUBSERVICER FOR
FEDERAL NATIONAL MORTGAGE ASSOCIATION ("FANNIE MAE"), A
CORPORATION ORGANIZED AND EXISTING UNDER THE LAWS OF THE
UNITED STATES OF AMERICA to continue its contractual remedies or other remedies

that may be available under state law, by reason of failure of the debtor to make regular monthly mortgage payments outside the Chapter 13 Plan.

PLEASE TAKE FURTHER NOTICE, that in support of the within Motion, the Movant will rely upon the Certification in Support and the proposed Order submitted herewith, as well as, oral arguments, if necessary. Pursuant to D.N.J. LBR 9013-2, Movant states that no brief or memorandum of law is necessary because of the absence of novel or complex questions of law. However, if responsive papers are filed in opposition to the Motion, the Movant reserves the right to respond to any issues of law raised therein in the form of a brief or a memorandum of law.

Dated: June 18, 2018

/s/ Sherri J. Smith
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